

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

ALLISON COLLIER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:07-cv-00922-MHT-CSC
	)	<b>JURY TRIAL DEMANDED</b>
UNIVERSAL FIDELITY LP, a foreign	)	
limited partnership, HSBC BANK NEVADA,	)	
N.A., a foreign company, and NATIONAL	)	
ASSET RECOVERY, INC., a foreign	)	
corporation,	)	
	)	
Defendants.	)	

**REPORT OF THE PARTIES' PLANNING MEETING**

1. APPEARANCES: Pursuant to Rule 26(f) of the *Federal Rules of Civil Procedure* and Local rule 26.1(a), a conference was held on April 24, 2008 via teleconference and/or email between the following: <sup>1</sup>

Keith Anderson Nelms, for Plaintiff;

Neal D. Moore, for Defendant National Asset Recovery.
2. PRE-DISCOVERY DISCLOSURES: The parties will exchange, by **June 15, 2008**, the information required by Local Rule 26.1(a)(1).
3. DISCOVERY PLAN: The parties jointly propose to the Court the following discovery plan:
  - (a) Discovery will be needed on the following subjects:
    1. All information pertaining to Plaintiff's claims and damages;
    2. Defendants' defenses.

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<sup>1</sup> The named defendant Universal Fidelity has settled its claims with the plaintiff and the appropriate documentation will be filed separately. An Affidavit for Default Judgment was filed against HSBC Bank Nevada, N.A., on April 22, 2008. The deadline to reply to the plaintiff's First Amended Complaint as required by the Federal Rules of Civil Procedure has expired.

- (b) All discovery must be commenced in time to be completed by **October 15, 2008**.
- (c) There will be a maximum of **30** interrogatories by each party, including sub-parts, to any other party. The responses will be due **30** days after service.
- (d) There will be a maximum of **30** requests for production of documents by each party, including sub-parts, to any other party. The responses will be due **30** days after service.
- (e) There will be a maximum of **15** requests for admission by each party, including sub-parts, to any other party. The responses will be due **30** days after service.
- (f) The parties agree that no more than **5** depositions may be taken by a party without leave of Court or agreement of the parties. The parties agree that each deposition is limited to a maximum of **7** hours unless extended by agreement of the parties.
- (g) Reports from retained experts under Rule 26(a)(2) will be due from Plaintiff by **June 1, 2008**, and from Defendants by **July 15, 2008**.
- (h) Supplementation of the core disclosures under Rule 26(e) will be due within **30** days before the end of the discovery period.

4. OTHER ITEMS:

- (a) **Scheduling Conference:** The parties do not request a conference with the Court before entry of the scheduling order.
- (b) **Dispositive Motions:** All potentially dispositive motions must be filed by **September 15, 2008**.
- (c) **Settlement:** Settlement and the possibility for mediation cannot be evaluated until some discovery is completed.
- (d) **Pretrial Conference:** The parties request a final pretrial conference **30** days before trial.

- (e) **Trial Evidence:** the final list of witnesses and trial evidence under Rule 26(a)(3) should be due **30** days before trial. The parties should have **10** days after service of the final lists of trial evidence to list objections under Rule 26(a)(3).
- (f) **Trial Date:** The case should be ready for trial by **November 1, 2008**, and is expected to take approximately **1** day of trial time.

Dated: April 25, 2008.

/s/ Andy Nelms  
Keith Anderson Nelms  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have served a copy of the foregoing REPORT OF THE PARTIES' PLANNING MEETING upon the following electronically via email or by placing a copy thereof, addressed to him or her as indicated below, in U.S. Mail, first class postage prepaid, on this the 30th day of April, 2008.

Universal Fidelity LP, John Jackson, Esq.  
c/o The Corporation Company  
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Montgomery, Alabama 36109

HSBC Bank Nevada, N.A.  
Charter Number 22675  
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Las Vegas, Nevada 89144

/s/ Andy Nelms  
Of Counsel